

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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In the Matter of the Application of

MARIAH LOPEZ,

**AFFIDAVIT OF PAUL
HARGROW**

Petitioner, Index No. 100632/2017

-against-

Motion Seq. No. 1

N.Y.C. DEPARTMENT OF HOMELESS SERVICES,
PROJECT RENEWAL,

I.A.S. Part 12 (Jaffe, J.)

Respondents.
----- X

State of New York)
) SS.:
County of New York)

PAUL HARGROW, being duly sworn, makes the following statement:

1. I am a Program Administrator ("PA") in the Adult Services Division of the New York City Department of Homeless Services ("DHS" or "Agency"). DHS Adult Services includes shelters for single adults as well as adult families. I have held this position since I joined DHS on February 21, 2017.

2. I submit this affidavit upon my personal knowledge of the facts and circumstances, as well as my conversations with City employees and my review of City records.

I. Introduction

3. I am the Program Administrator for WIN West, which is located at 341 West 51st Street in mid-town Manhattan.

4. As a Program Administrator, I am responsible for: managing shelter budgets and staff as well as providing guidance to shelter providers regarding DHS programs and procedures.

In addition, I audit shelter providers to ensure program performance levels are met and managed in accordance with evidence based practice.

II. Reasonable Accommodations

5. DHS has approved Ms. Lopez' emotional support animal as a reasonable accommodation. Once a reasonable accommodation is approved, DHS recognizes the approval at any site the client is transferred to.

6. Therefore Ms. Lopez is authorized by DHS to bring her emotional support animal with her to the WIN West shelter or any other DHS shelter where she may be assigned.

III. WIN West

7. WIN West is a shelter for single adult females. It has mental health services on site.

8. WIN West is run by Women In Need, Inc. ("WIN"). WIN is a non-profit contracted shelter provider for DHS. WIN West provides the following services on site: Psychiatric Nurse Practitioner; four (4) social workers; four (4) clinical background Masters Level Case Managers; psychoeducational groups daily; a licensed practical nurse; DHS Police security; and a licensed creative arts therapist.

9. WIN West currently has transgender individuals assigned to the shelter.

10. In addition to EEO Diversity Training and Employment Sensitivity Training, WIN West staff receives training for working with serious and persistent mentally ill clients.

11. As the DHS PA for WIN West, I review all Incident Reports submitted to DHS from WIN West.

12. To my knowledge, WIN West has not had any Priority 1, 2 or 3 Incidents – as defined on the DHS incident reports – related to transgender clients since I have been PA.

13. None of the transgender clients at WIN West have requested a transfer out of WIN West for any reason, including incidents occurring at WIN West.

14. If DHS learned of incidents at WIN West related to transgender clients, DHS could take actions against both WIN West staff and clients.

15. If WIN West clients behave inappropriately towards transgender individuals, DHS has several remedies available. DHS can transfer the offending client to another shelter, suspend shelter for up to seven (7) days, and/or sanction (terminate housing assistance) for the offending client.

16. I do not believe that Ms. Lopez' assertions that she will find a hostile environment at the WIN West shelter are based in fact, and I am aware of no factual basis for her contention.

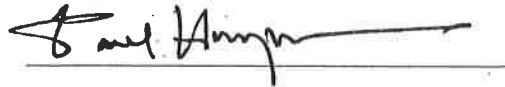
17. I also note that the security at the WIN West shelter is provided by DHS Police. DHS Police have often had success obtaining compliance with DHS rules from clients, and clients seem to be less inclined to violate DHS rules or to try to bring prohibited items into shelters where DHS Police are providing security than where security is provided by a private security firm retained by the shelter operator.

IV. Conclusion

18. DHS has granted Ms. Lopez' request to have her emotional support animal, and she is authorized to access WIN West with her dog.

19. WIN West is a safe shelter facility with social services as well as mental health services on site and security provided by DHS Police.

20. I believe WIN West would be an appropriate placement for Ms. Lopez.



PAUL HARGROW

Sworn before me this 24th

Day of May, 2017



Notary Public State of New York

NATASHA L. GODBY
Notary Public, State of New York
No.01GO5040606
Qualified in Richmond County
Commission Expires, March 20, 2019

Index No. 100632/201

Part 12 (Jaffe, J)

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NEW YORK CITY DEPARTMENT OF HOMELESS SERVICES
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Respondents.

AFFIDAVIT OF PAUL HARGROW

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Tel: (212) 356-0872
Matter #: 2017-025551*

Due and timely service is hereby admitted.

New York, N.Y., 20....

....., Esq.

Attorney for